

## **ACCUSATIONS/ STATEMENTS OF ISSUES**

**January 1, 2003 to March 31, 2003**

(rev. 8-28-03)

### **Statement of Issues, January 7, 2003, EMSA Case No. 02-100**

In September of 2002, Respondent's request for a paramedic license was denied because Respondent (1) was convicted in June of 1990 of burglary, a misdemeanor; (2) was convicted in June of 1999 of petty theft with a prior, a misdemeanor; (3) failed to disclose the burglary conviction on his 1994, 1996, and 1998 EMT applications with multiple local EMS agencies; and (4) failed to disclose the burglary conviction on his 1995 and 1999 ambulance driver certificate applications.

Licensure action being taken pursuant to California Health and Safety Code Sections 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act; and 1798.200(c)(6)- Conviction of a Crime.

### **Accusation, January 23, 2003, EMSA Case No. 02-253**

Respondent was convicted of misdemeanor sexual battery by restraint. Moreover, Respondent is required to register as a sex offender.

Licensure action being taken pursuant to California Health and Safety Code Section 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act.

### **Accusation, January 23, 2003, EMSA Case No. 01-028**

Respondent physically abused an unconscious patient. Moreover, Respondent failed to follow protocols and documented on a PCR that he took the patient's blood pressure, which he never did.

Licensure action being taken pursuant to California Health and Safety Code Sections 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act; 1798.200(c)(7)- Violating or Attempting to Violate Statutes and Regulations; 1798.200(c)(10)- Outside the Supervision of Medical Control 1798.200; and 1798.200(c)(12)(a)- Mistreatment or Physical Abuse of Patient.

### **Statement of Issues, January 23, 2003, EMSA Case No. 01-172**

In August of 2002, Respondent's request for a paramedic license was denied because Respondent (1) was convicted in 1993 of theft and unlawful possession of alcohol, both misdemeanors; (2) was convicted in 1993 of defacing a driver's license and unlawful purchase of alcohol, both misdemeanors; (3) was convicted in 1994 of criminal mischief, a felony; (4) was convicted in 1994 of littering; (5) was convicted in 1995 of unlawful purchase, possession, or consumption by minors of alcohol, a misdemeanor; (6) was convicted in 1996 of DUI, a misdemeanor; (7) was convicted in 2002 of DUI, a misdemeanor; and (8) failed to disclose and/or misrepresented the convictions in his application to EMSA.

## **ACCUSATIONS/ STATEMENTS OF ISSUES**

**January 1, 2003 to March 31, 2003**

(rev. 8-28-03)

Licensure action being taken pursuant to California Health and Safety Code Sections 1798.200(c)(1)- Fraud in the Procurement of any Certificate or License; 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act; 1798.200(c)(6)- Conviction of a Crime; and 1798.200(c)(9)- Addiction to or Misuse of Alcohol, Narcotics, Dangerous Drugs, or Controlled Substances.

### **Accusation, January 23, 2003, EMSA Case No. 02-063**

Respondent was convicted in 2001 of insurance fraud, a misdemeanor; and was convicted in 2000 of disturbing the peace, a misdemeanor. Moreover, Respondent failed to disclose either conviction on his request for a duplicate ambulance driver certificate in 2001.

Licensure action being taken pursuant to California Health and Safety Code Section 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act.

### **Accusation and Order for Temporary Suspension, February 21, 2003, EMSA Case No. 03-041**

Respondent submitted a fraudulent course completion certificate to the EMS Authority in order to receive a paramedic license.

Licensure action being taken pursuant to California Health and Safety Code Sections 1798.200(c)(1)- Fraud in the Procurement of any Certificate or License; 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act; and 1798.200(c)(7)- Violating or Attempting to Violate Statutes and Regulations.

### **Accusation, March 6, 2003, EMSA Case No. 02-115**

Respondent was arrested for a "hit and run" accident while driving under the influence of alcohol. He was subsequently convicted of driving under the influence.

Licensure action being taken pursuant to California Health and Safety Code Section 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act.

### **Accusation, March 7, 2003, EMSA Case No. 01-014**

Respondent was responsible for attempting Combitube placement and nasotracheal intubation on a child less than 16 months old, both of which treatments are clearly contraindicated. Furthermore, on numerous occasions Respondent failed to properly document treatment on patient care reports; Respondent had an explorer scout perform an ALS procedure; and Respondent made multiple false statements.

## **ACCUSATIONS/ STATEMENTS OF ISSUES**

**January 1, 2003 to March 31, 2003**

(rev. 8-28-03)

Licensure action being taken pursuant to California Health and Safety Code Sections 1798.200(c)(2)- Gross Negligence; 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act; 1798.200(c)(7)- Violating or Attempting to Violate Statutes and Regulations; and 1798.200(c)(10)- Outside the Supervision of Medical Control 1798.200.

### **Accusation and Order for Temporary Suspension, March 14, 2003, EMSA Case No. 03-065**

Respondent submitted a fraudulent course completion certificate to the EMS Authority in order to receive a paramedic license.

Licensure action being taken pursuant to California Health and Safety Code Sections 1798.200(c)(1)- Fraud in the Procurement of any Certificate or License; 1798.200(c)(5)- Fraudulent, Dishonest, or Corrupt Act; and 1798.200(c)(7)- Violating or Attempting to Violate Statutes and Regulations.

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*An Accusation is a charging document that alleges violation(s) of Division 2.5 of the Health & Safety Code. The Respondent must admit the allegation(s) by way of a settlement, choose not to contest the allegation(s), or the EMS Authority must prove the allegation(s) at a contested hearing before the alleged acts are deemed to have occurred.*

*A Statement of Issues is an appeal by an individual who was denied a paramedic license by the EMS Authority, and is handled similar to an Accusation.*

*The Accusation and Statement of Issues are public documents and are available for a minimal cost by calling the EMS Authority's Enforcement Unit at telephone number (916) 322-4336.*